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14 Attorneys for Defendants

15 FIDELITY NATIONAL TITLE GROUP, INC., CHICAGO
16 TITLE INSURANCE COMPANY, and TICOR TITLE OF
17 NEVADA, INC.

18 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
19 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

20 Gary L. Compton, State Bar No. 1652
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23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 DEUTSCHE BANK NATIONAL TRUST
26 COMPANY,

27 Plaintiff,

28 vs.

CHICAGO TITLE INSURANCE
COMPANY et al.,

Defendants.

Case No.: 2:21-CV-01854-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FOURTH REQUEST

25 COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Chicago Title
26 Insurance Company (“Chicago Title”) and Ticor Title of Nevada, Inc. (“Ticor Agency”)
27 (collectively “Defendants”) and plaintiff Deutsche Bank National Trust Company (“Deutsche
28

1 Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as
2 follows:

3 1. On October 6, 2021 Deutsche Bank filed its complaint in the Eighth Judicial
4 District Court for the State of Nevada;

5 2. On October 6, 2021, Chicago Title removed the instant case to the United States
6 District Court for the State of Nevada (ECF No. 1);

7 3. On January 19, 2022, the parties submitted the first stipulation for an extension of
8 time for Defendants to respond to Deutsche Bank’s complaint, which was granted by the Court on
9 January 20, 2022 (ECF No. 24);

10 4. On February 23, 2022 the parties submitted the second stipulation for an extension
11 of time for Defendants to respond to Deutsche Bank’s complaint, which was granted by the Court
12 on February 24, 2022 (ECF No. 26);

13 5. On March 21, 2022, the parties submitted the third stipulation for an extension of
14 time for Defendants to respond to Deutsche Bank’s complaint, which was granted by the Court on
15 March 22, 2022 (ECF No. 28);

16 6. Counsel for Defendants request a further two-week extension for Defendants to file
17 their respective responses to Deutsche Bank’s complaint, through and including Monday, May 9,
18 2022, to afford Defendants’ counsel additional time to review and respond to Deutsche Bank’s
19 complaint.

20 7. Counsel for Deutsche Bank does not oppose the requested extension;

21 8. This is the fourth request for an extension made by counsel for Defendants, which
22 is made in good faith and not for the purposes of delay.

23 9. This stipulation is entered into without waiving any of Defendants’ objections
24 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Monday, May 9, 2022.

3 Dated: April 25, 2022

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 FIDELITY NATIONAL TITLE GROUP,
INC., CHICAGO TITLE INSURANCE
COMPANY, and TICOR TITLE OF
NEVADA, INC.

9 Dated: April 25, 2022

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Dragon

12 LINDSAY D. DRAGON
13 Attorneys for Plaintiff
14 DEUTSCHE BANK NATIONAL TRUST
COMPANY

15 **IT IS SO ORDERED.**

16 Dated this 26th day of April, 2022.

17 
18 DANIEL J. ALBREGTS
19 UNITED STATES MAGISTRATE JUDGE